

# CLEARY GOTTLIEB STEEN & HAMILTON LLP

2000 Pennsylvania Avenue, NW  
 Washington, DC 20006-1801  
 T: +1 202 974 1500  
 F: +1 202 974 1999  
[clearygottlieb.com](http://clearygottlieb.com)

**NEW YORK**  
**PARIS**  
**BRUSSELS**  
**LONDON**  
**FRANKFURT**  
**COLOGNE**  
**MOSCOW**

**ROME**  
**MILAN**  
**HONG KONG**  
**BEIJING**  
**BUENOS AIRES**  
**SÃO PAULO**  
**ABU DHABI**  
**SEOUL**

GEORGE S. CARY	BRANDON R. AGNING	DREW A. NARVAKAS
MICHAEL S. DUPLER	NICHOLAS AMIN*	JOSHUA NAMINGA*
GIOVANNI P. PREZIOSO	TAYLOR H. BATES	MURMIA ODEMYIDE
MICHAEL H. WERNINGER	ZACHARY D. BAUM*	KAREN C. OCAGIO
MATTHEW H. SLATER	ELIZABETH BARTT	SAMUEL SHAW PARK
DAVID I. GELFAND	GRANTA BERNHARD	JENNIFER E. PAUL
MICHAEL A. MAZZUCHI	LINDON BERNHARDT	ANGRY V. PHILLIPS
MARK W. NELSON	PHILIP L. BHANUJ	ROBIN RABINOWITZ
ROBIN M. BERGEN	JELLINE B. BHANUJ	MARTHA RADNER
DEBORAH J. BOCH	LAWRENCE A. COALEY	INDRA R. ROHOF
BRIAN BYRNE	EVERETT K. CORACR	MARK ROMAN
PAUL D. MARQUARDT	LISA M. CANZIO*	MICHAEL RUTHENSTRO
JEREMY CALSTIN	KATHERINE DENBY*	MARSHALL
LEAH CANNON*	OLIVIA C. ESTEP	MICHAEL G. SANDERS*
MARGARET A. SOLOMON	BRUNO J. FIGG	WILLIAMS
KATHERINE MCONEY CARROLL	RACHEL FRANK*	OMAR SERAGELDIN
PAUL R. ST. LAWRENCE	ALAN B. FREEMAN	GARRETT T. SHAW
ELAINE EWING	ALEXANDER GEORGE GALICH	CAROLINE SHATTAN
KENNETH S. HAMBURGER	CAROLINE R. GEIST-BENITEZ*	SARAH M. SPORN
KENNETH S. REINKE	V. KATHRYN STONE*	C. NICKLAS STEER
REMBERT PARTNERS	MELISSA GHOLKE	ERIC C. STIMHART
KENNETH L. BACHMAN, JR.	REBECCA F. GREEN	CHARLES STERLING
CAROLE L. SILVER	DAVID GRITCHOUSE*	RYAN SUSS
RICHARD DEC. HINDS	ANNE STUTZ HLEY	MICHAEL SWARTZ
SARA D. SCHOTLAND	CHRISTOPHER J. WILDEBRAND	TARA LYNN TAVERRINA
WILLIAM J. TURNER III	EILEEN HO	ZACH TSCHIDA
JOHN S. MAGNEY	RICHARD HUBER*	CATHERINE UFER
MARK LEDDY	JAMES HUNTSBERGER	CHRISTOPHER A. WETZEL
JOHN C. MURPHY, JR.	PATRICK J. KEEGAN	JOHN W. WILSON
DAVID M. NECKTER	BRENDAN JORDAN	HUANGJING XU*
JAMES P. NELLEN	BRIAN KESTEN*	JEANINE PALOMA ZELMATI*
LINDA J. SOLDI	BUDDY KHAN	ASSOCIATES
SENIOR COUNSEL	PATRICK D. KIRBE	
W. RICHARD BODSTRUP	ANDREW L. KLINE	
STEVEN J. KAISER	JOHN F. KOZAK	
CUNZHENG HUANG**	NATHANAEL F. KURKAB	
MATTHEW R. WASHINGTON	GRACE KURLAND	
COUNSEL	ALEXIS R. B. LAZD	
JOHN P. MCGILL, JR.	CHRISTOPHER J. LEE	
MATTHEW I. BACHRACK	BRANDON LEVEY	
LARRY WOOD-DEMBSKI	NICOLE S. LIM	
ALEXANDER COLLINS	CHRIS MACCOLL	
CARL F. FERGUSON	CARL LAWRENCE MALM	
PATRICK FULLER	MICHAEL J. MANN	
SAIF I. SHAH MOHAMMED	TANNER W. MATHISON	
SENIOR ATTORNEYS	ADAM MOTWAALA	
	MORGAN L. MULVENON	

\* Admitted only to bar other than that of the District of Columbia. Working under the supervision of principals of the Washington office.  
 \*\* Special Legal Consultant, qualified in the People's Republic of China.

Writer's Direct Dial: +1 202 974 1522  
 E-Mail: [jcalsyn@cgsh.com](mailto:jcalsyn@cgsh.com)

October 29, 2018

Attorney General Alan Wilson  
 Office of the Attorney General  
 Rembert Dennis Building  
 1000 Assembly Street, Room 519  
 Columbia, SC 29201

S.C Attorney General's Office  
 Civil Division - FOIA

## In re: South Carolina Freedom of Information Act Request

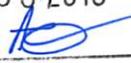
Dear Attorney General Wilson,

I am writing on behalf of my client, Yazaki North America, to request the disclosure of public records pursuant to the South Carolina Freedom of Information Act, § 30-4-10 et seq., ("FOIA"). Please provide us with the information identified below (the "Requested Information"):

A copy of each and every agreement to settle any claim under state and/or federal law related to any alleged combination or conspiracy to suppress and eliminate competition in the automotive parts industry by agreeing to rig bids for, or fix, stabilize, or maintain the prices of, automotive parts between 2000 and the present.

If any of the Requested Information cannot be provided to us, please provide us with documents or information sufficient to allow us to identify an alternate source for the Requested Information, or, in the alternative, please provide us with information that will allow us to more appropriately tailor our Request.

As you know, §30-4-30 of FOIA requires that an agency notify the person making the FOIA request of the agency's determination and the reason for it within ten days (excluding Saturdays, Sundays, and legal holidays) for records less than 24 months old of receipt of that

OCT 30 2018  
  
 Received by: \_\_\_\_\_  
 Reviewed by Date: \_\_\_\_\_  
 Referred to Date: \_\_\_\_\_  
 Notes: \_\_\_\_\_

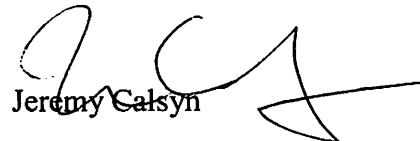
request. For requested records that are more than 24 months old as of the date of this request, you have twenty days (excluding Saturdays, Sundays, and legal holidays) to respond. If the request is granted, you must furnish the record or make it available for inspection or copying within 30 or 35 days of your response, depending on whether the records are more than 24 months old. Because some of the records here may fall into the latter category, you may provide a single response as to all requested items within the 20-day deadline and provide the records within the 35-day deadline. By my calculation, your response is due on or before **November 18, 2018**. Accordingly, please provide a response by that date, or, alternatively, provide the explanations and information required by law.

We would be happy to cover all copying and mailing fees associated with your provision of the Requested Information. Please direct all future written responses to my attention at:

Cleary Gottlieb Steen & Hamilton LLP  
2000 Pennsylvania Ave.  
Washington, DC 20006

Thank you for your attention to this matter. If you have any questions or need additional information, please do not hesitate to contact me at [JCalsyn@cgsh.com](mailto:JCalsyn@cgsh.com) or (202) 974-1522.

Sincerely,



Jeremy Calsyn